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August 11, 1997

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

**Re: CC Docket No. 96-45, DA 97-1433**

Dear Mr. Caton:

On the afternoon of August 8, 1997 USTA filed a Request for Extension of Time to File Data in the above-referenced proceeding. While otherwise in full compliance with § 1.419 of the Commission's rules, 47 C.F.R. § 1.419, the motion was inadvertently delivered to the Universal Service Branch of the Common Carrier Bureau rather than to your office. Enclosed herewith is USTA's original date-stamped copy along with four copies. USTA respectfully requests that either the original motion delivered to the Universal Service Branch on August 8 or the enclosed date-stamped copy be treated as though filed in full accordance with § 1.419.

Please feel free to contact me at (202) 326-7255 should it be necessary to discuss this matter in further detail.

Sincerely,

A handwritten signature in cursive script that reads "Hance Haney".

Hance Haney  
Counsel and Director  
Legal & Regulatory Affairs

Enclosures

No. of Copies rec'd  
List ABCDE

Handwritten initials, possibly "OSK", written in cursive.

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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AUG 11 1997

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of

Federal-State Joint Board on  
Universal Service

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CC Docket No. 96-45  
DA 97-1433

To: Common Carrier Bureau

**REQUEST FOR EXTENSION OF TIME TO FILE DATA  
UNITED STATES TELEPHONE ASSOCIATION**

Pursuant to § 1.46 of the Commission's rules, 47 C.F.R. § 1.46, the United States Telephone Association (USTA), on behalf of the Regional Holding Companies (RHCs), GTE and Sprint Corporation (Sprint)<sup>1</sup>, respectfully requests an extension of 28 working days from Oct. 15, 1997 to file certain data in response to the Order released on July 9, 1997 (*Data Request Order*) in the above-referenced proceeding. Specifically, USTA requests permission to file no later than Sept. 24, 1997 the following data referenced in paragraph 7 of the *Data Request Order*:

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<sup>1</sup> The two other companies subject to this data request, Anchorage Telephone Utility and Puerto Rico Telephone Company, plan to file separate motions for extension of time in their individual capacities. In addition, one or more companies for whom USTA makes this request may file additional requests seeking an extension of time for specific items as necessary.

- (3) Subscriber line usage studies.
- (5) Apportionment of cable costs.
- (6) Installation cost data for cable facilities.
- (7) Subscriber utilization studies.
- (8) Structure-sharing expenses.
- (9) Multi-line residential customers.
- (11) Detailed continuing property records.<sup>2</sup>
- (14) Digital line carrier devices.
- (18) Residential, single-line business, and multi-line business customers.

USTA believes that the extension it requests is justified due to the fact that many of the personnel that are essential to filing data in response to this data request are also involved in filing the responses to the FCC's Further Notice of Proposed Rulemaking (*FNPRM*) in CC Docket Nos. 96-45 and 97-160 regarding the forward-looking mechanism for determining

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<sup>2</sup> Certain LECs who have been party to the FCC's Continuing Property Record review feel that that is the best source of data for this item. Detailed continuing property record data would be an extract of the information provided on June 30, 1997. This data represents the latest and most complete information available. These records are updated continually. It would take considerable effort to extract the information from the existing records, remove the additions that have been put in service and to recreate and remove any retirement transactions that have taken place since December 31, 1996. This process is not a normal function of the CPR process and would result in two views of the same data that would only differ by six months additions and retirements. It does not seem that the extra effort required to perform this imputation would produce significantly results to be used for the high cost mechanism. Southwestern Bell Telephone Company, Pacific Bell, Nevada Bell and U S WEST therefore intend to provide an extract of the previously provided June 20, 1997 COE CPR data to meet the requirement for this item.

high cost support for non-rural LECs and in the response to the FCC's Designation Order in CC Docket No. 97-149 regarding the issues for investigation in the 1997 Annual Access Tariff Filings. Because of the large amounts of data to be filed in connection with all of these proceedings, there simply is not enough time for the parties for who USTA files this Motion to prepare thorough, validated responses for filing on Oct. 15, 1997.

This extension would be consistent with the date in the *FNPRM* for the submission of comments for outside plant investment components for the platform, and is well before the Oct. 17, 1997 deadline for the submission of all input values. We would anticipate that additional information regarding the inputs is likely to be provided by all parties to that proceeding up to the final Oct.27 date for reply comments. In USTA's opinion, the extension sought herein will not unduly burden the Commission's efforts to develop the input values for the non-rural carriers high cost fund mechanism.

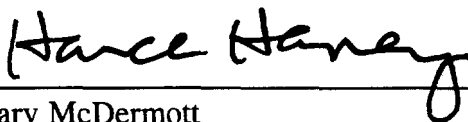
The parties for whom USTA files this Motion anticipate that it will be possible to supply the remaining data requested by the Commission on Aug. 15, but note that in the case of certain items they are likely to discover that revisions or corrections are necessary as the rest of the data request is completed. These items are: (1) Loops, (2) Loop length studies, and (12) Digital switches. Any revisions or corrections in the data submitted on Aug. 15 would also be provided on Sept. 24, 1997.

In addition, these parties also note that with respect to item (13), Contracts with switching manufacturers, and item (21), Contracts with digital line carrier manufacturers, some carriers are required by contracts to seek permission to release the requested data. Those carriers may not be able to meet the Aug. 15 deadline if the manufacturers do not respond in a timely manner. Companies who are only required to notify the manufacturer will provide the requested information by Aug. 15.

For the reasons stated herein, USTA respectfully requests that the Bureau grant this Motion.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

By:   
Mary McDermott  
Linda Kent  
Keith Townsend  
Hance Haney

Its Attorneys

1401 H Street, N.W., Suite 600  
Washington, D.C. 20005  
(202) 326-7255

August 8, 1997

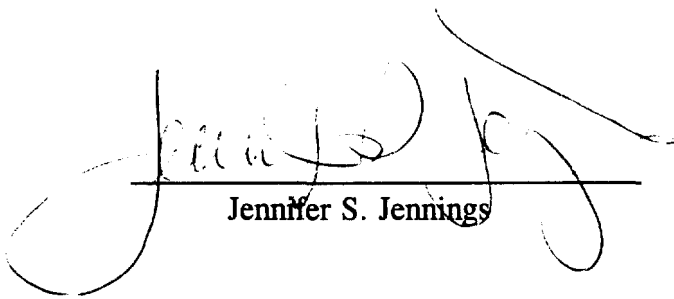
CERTIFICATE OF SERVICE

I, Jennifer S. Jennings, certify that true and correct copies of the foregoing Request for Extension of Time of the United States Telephone Association were delivered by hand delivery on August 8, 1997, to the following :

L. Charles Keller  
Federal Communications Commission  
2100 M Street, N.W., Room 8918  
Washington, D.C. 20554

Sheryl Todd  
Universal Service Branch  
Accounting and Audits Division  
Common Carrier Bureau  
Federal Communications Commission  
2100 M Street, N.W., Room 8611  
Washington, D.C. 20554

ITS  
1231 20th Street, N.W.  
Room 102  
Washington, D.C. 20037



Jennifer S. Jennings